

# Lepage Environmental Services, Inc.

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March 21, 2001

Mr. Orlando J. Monaco  
Code 1821 LM  
Department of the Navy, Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway, Mail Stop 82  
Lester, PA 19113-2090

EA ENGINEERING  
SCIENCE & TECHNOLOGY

MAR 23 2001

RECEIVED

Subject: *Final Letter Work Plan for Ground-Water and Soil Investigation at Site 7*

Dear Mr. Monaco:

The following comments on the February 2001 *Final Letter Work Plan for Ground-Water and Soil Investigation at Site 7* (Work Plan) are submitted on behalf of the Brunswick Area Citizens for a Safe Environment (BACSE):

**1. General Comment.** The Work Plan outlines a phased approach for investigations of soil and ground water at Site 7. Phase 1 addresses a short-duration pumping test to see if cadmium concentrations in ground water change with time. Phase 2 covers the installation of temporary sampling points, a limited soil excavation, and limited onsite soil screening. We are troubled by the timeframe implied in the document, as it is inaccurate and misleading. The Work Plan, which is dated February 8, 2001, is written as if Phase 1 activities have not yet been conducted, and Phase 2 is described as "may be necessary" on page 1. In fact, Phase 1 was completed in December 2000, and, based on the Phase 1 results, the Navy intends to proceed with Phase 2 in the summer 2001 field season. This information should have been incorporated in the Final Work Plan, along with a reference to the results of Phase 1. It is not appropriate for the Final Work Plan to become part of the Administrative Record as currently written. Either the Work Plan should be revised and resubmitted to the Record, or a letter clarifying the timeframe should be added to the current Work Plan.

**2. Page 3, Step 1-Installation of Temporary Sampling Points.** The first line in the first bullet begins "Install, develop, and sample 2 temporary sampling points...". In fact there are three points proposed. The bullet also mentions the proposed sampling locations and ground water flow patterns shown on Figure 3. We concur with the Maine Department of Environmental Protection's (MEDEP's) comments dated February 20, 2001, that because the flow directions shown on Figure 3 are incorrect (as a result of the wrong water level elevation being used for one well), the location of the temporary sampling points should also be reconsidered. We also concur that additional sampling points are needed.

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**3. Page 4, Step 1-Installation of Temporary Sampling Points.** The Work Plan proposes waiting for the results for samples collected from two temporary sampling points before collecting the third sample. We strongly suggest samples be collected from all sampling points at the same time. We also assume that samples will be collected utilizing low-flow sampling techniques currently employed in CERCLA-related sampling at the base.

**4. Page 4, Step 1-Installation of Temporary Sampling Points.** The second bullet contains the statement that if cadmium concentrations are below 5 ug/L, the extent of the cadmium-impacted ground water can be inferred to be immediately around and upgradient of wells MW-NASB-094 and MW-NASB-229. The basis for this statement should be provided. However, we concur with the MEDEP and the Environmental Protection Agency (EPA) that additional sampling points are needed at upgradient locations.

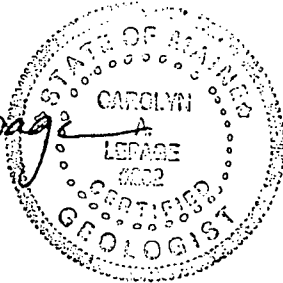
**5. Page 5, Step 2-Complete Excavation and Visual Survey.** According to the last bullet on the page, the one permanent monitoring well to be installed downgradient of the excavated area will be sampled two weeks after development. We share MEDEP's concern that two weeks may be insufficient for well recovery. We also agree with MEDEP that one round of ground water sampling is inadequate to confirm site conditions prior to accepting site closure. Uncertainties resulting from the "rebounding" cadmium concentrations described in EPA's February 26, 2001, comment letter will also need to be addressed.

Please do not hesitate to call me if you have any questions.

Sincerely,

*Carolyn A. Lepage*

Carolyn A. Lepage, C.G.  
President



cc: Loukie Lofchie, BACSE  
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